

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

HELLO PRODUCTS, LLC,

Plaintiff,

vs.

UNCONDITIONAL LOVE INC.,

Defendant.

CA No. 2:20-cv-12618-KM-JBC

**STIPULATION AND ORDER
ADJOURNING SCHEDULE**

WHEREAS, Plaintiff and Counter-Defendant Hello Products, LLC (“Hello”) moved to dismiss the counterclaims of Defendant and Counter-Claimant Unconditional Love Inc. d/b/a Hello Bello (“Hello Bello”) on January 15, 2021; Hello Bello’s response is due February 12, 2021; Hello’s reply brief is due on February 22, 2021; and the return date for the Motion to Dismiss is March 1, 2021, as set out in Stipulation and Order Extending Time to Respond to Complaint, Dkt. No. 16 (Dec. 9, 2020); and

WHEREAS, on January 26, 2021, this Court held a Rule 26(f) Scheduling Conference and issued a Pretrial Scheduling Order, Dkt. No. 18 (Jan. 15, 2021) (“Scheduling Order”);

WHEREAS, the Scheduling Order (¶ 3) set February 26, 2021, as the last date on which interrogatories, initial requests for production, and initial requests for admissions may be served;

WHEREAS, the Scheduling Order (¶ 8) set March 15, 2021, as the last date on which the parties may file a proposed confidentiality order with the Court;

WHEREAS, the Scheduling Order (¶ 3) set March 29, 2021, as the last date on which responses to interrogatories, initial requests for production, and initial requests for admissions may be served;

WHEREAS, the Scheduling Order (¶ 7) set April 19, 2021, as the last date on which the parties may bring unresolved discovery disputes before the Court; and

WHEREAS, the parties seek additional time to discuss a potential settlement.

IT IS HEREBY STIPULATED AND AGREED, by and between the parties through their respective attorneys, as follows:

1. Certain deadlines ordered by the Court shall be adjourned while the parties discuss settlement such that the new deadlines are as follows:

<u>Event</u>	<u>Last Date (Current)</u>	<u>Last Date (New)</u>
Hello Bello shall file any opposition to the Motion to Dismiss	02/12/2021	04/09/2021
Hello shall file any reply brief in further support of the Motion to Dismiss	02/22/2021	04/30/2021
Parties may serve interrogatories, initial requests for production of documents, and initial requests for admissions	02/26/2021	04/30/2021
Return date for the Motion to Dismiss	03/01/2021	05/07/2021
Parties may submit any proposed confidentiality order	03/15/2021	05/10/2021
Parties may respond to any interrogatories, initial requests for production of documents, and initial requests for admissions	03/29/2021	06/04/2021
Parties may bring any unresolved discovery disputes (other than those that arise during depositions) before the Court	04/19/2021	06/22/2021

2. All remaining dates set forth in the Scheduling Order shall remain unchanged.

3. For purposes of this stipulation, electronic signatures shall be considered as original.

DATED: February 5, 2021

O'TOOLE SCRIVO, LLC

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*Attorneys for Defendant and Counter-Claimant
Unconditional Love Inc. d/b/a Hello Bello*

SO ORDERED

DATED:

HON. KEVIN MCNULTY

United States District Judge